



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 16, 2015

ADAM GREEN, TREASURER
PROGRESSIVE CHANGE CAMPAIGN
COMMITTEE
PO BOX 73395
WASHINGTON, DC 20056

Response Due Date
04/20/2015

IDENTIFICATION NUMBER: C00458000

REFERENCE: AMENDED 12 DAY PRE-GENERAL REPORT (10/01/2014 -
10/15/2014), RECEIVED 01/27/2015

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 item(s):

1. Schedule B supporting Line 23 discloses one or more contributions to a candidate(s) for the 2014 Primary election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. (11 CFR §§110.1(b)(3) and 110.2(b)(3))

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund. (11 CFR §103.3(b)(1) and (3))

PROGRESSIVE CHANGE CAMPAIGN COMMITTEE

Page 2 of 3

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

2. Schedule B supporting Line 29 discloses disbursements to a non-federal account (see attached). You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding these transactions including the date(s) when the original activity was conducted by the non-federal account. In addition, if any of these disbursements were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in kind contributions on Schedule B supporting Line 23, or as independent expenditures on Schedule E supporting Line 24. (11 CFR §§104.3(b)(3) and 106.1)

Although the Commission may initiate legal action regarding the activities conducted by your non-federal account, any clarifying information that you can provide will be taken into consideration.

- Your report discloses certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your information and consideration when preparing future filings, contributions to Federal candidates and committees should be properly disclosed on a separate Schedule(s) B, supporting Line(s) 23 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (52 U.S.C. §30104(b) (formerly 2 U.S.C §434(b)) and FORM 3X Instructions)

- Schedule B of your report discloses an expenditure(s) for "Advertising," "Callers," and "Predictive Dialer." For your information and consideration when preparing future filings, if a portion or all of these expenditures were for

PROGRESSIVE CHANGE CAMPAIGN COMMITTEE

Page 3 of 3

public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and would be disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate would be reported on Schedule B for Line 21(b) of the Detailed Summary Page.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1162.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Butler', with a stylized, cursive script.

David Butler
Senior Campaign Finance Analyst
Reports Analysis Division

**Excessive, Prohibited, and Impermissible Contributions
Progressive Change Campaign Committee (C00458000)**

Contribution(s) Made After Election Date

Recipient Name	Date	Amount	Election	Election (State-Date)
Rick Weiland	10/8/14	\$1,000.00	P2014	SD-6/3/14

Transfer(s) Made to Non-Federal Account(s)

Recipient Name	Date	Amount	Report
PCCC Non-Federal Account	10/8/14	\$2,500.00	2014 12 Day Pre-General
PCCC Non-Federal Account	10/8/14	\$25.00	2014 12 Day Pre-General